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Attorneys for Defendant
WAYNE JOSEPH FERNANDES

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE BARRY TED MOSKOWITZ)**

UNITED STATES OF AMERICA,

Plaintiff,

V.

PETER CARLO MERTENS (1),
WAYNE JOSEPH FERNANDES (2),
WILLIAM HAMMAN (3), and
BETTINA THAKORE (4).

Defendants.

CASE NO.: 08CR0440-BTM

**DEFENDANT WAYNE JOSEPH
FERNANDES' NOTICE OF MOTIONS
AND MOTIONS (1) FOR 60-DAY
CONTINUANCE; (2) TO COMPEL
FURTHER DISCOVERY; (3) FOR
LEAVE TO FILE FUTURE SEVERANCE
MOTION AND OTHER MOTIONS, IF
NECESSARY**

Date: September 19, 2008
Time: 2:00 p.m.

1 **TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND**
2 **SHERRI WALKER HOBSON, ASSISTANT UNITED STATES ATTORNEY**

3 PLEASE TAKE NOTICE that on September 19, 2008, at 2:00 p.m., or as soon thereafter
4 as counsel may be heard, Defendant Wayne Joseph Fernandes, by and through his attorney of
5 record, Dorn G. Bishop of the Law Offices of Dorn G. Bishop, APC, will and hereby does move
6 this Court for an order granting Mr. Fernandes' motions (1) for a 60-day continuance of the
7 motions hearing in this case; (2) to compel further discovery from the Government; and (3) for
8 leave to file a future motion to sever and other motions, as necessary.

9 DATED: September 5, 2008

Respectfully submitted,

10 THE LAW OFFICES OF DORN G. BISHOP, APC

11 By: /s/Dorn G. Bishop
12 Dorn G. Bishop
13 Attorneys for Defendant Wayne Joseph Fernandes